

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11842-PBS

SCOTT RODGERS,	)	
Plaintiff,	)	
	)	
V.	)	<b>ASSENTED TO MOTION TO EXTEND</b>
	)	<b>THE DATE FOR THE DEPOSITION OF</b>
CORRECTION OFFICER ORCHID,	)	<b>JOHN B. HOWARD, M.D., TO A DATE</b>
UNKNOWN CORRECTION OFFICER	)	<b>CERTAIN OF SEPTEMBER 8, 2006.</b>
JOHN DOE, JOE WHITMORE, DR.	)	
HOWARD, JOHN SMITH, PLYMOUTH	)	
COUNNTRY,	)	
Defendants.	)	

Now comes the defendant, John B. Howard, M.D. in the above matter and hereby requests, with the assent of all counsel that the date for the deposition of John B. Howard, M.D. be extended to the date certain of September 8, 2006. As reasons therefor, the defendant, Dr. Howard states as follows:

1. This medical malpractice action was commenced on August 24, 2004;
2. On March 1, 2005 counsel for the Plymouth County Sheriff's Office filed an Answer and Jury Claim on behalf of Dr. Howard. The Plymouth County Sheriff's Office subsequently withdrew as counsel;
3. On August 2, 2006 the Honorable Marianne B. Bowler entered an Order that Dr. Howard's deposition take place on the date certain of August 8, 2006;
4. The undersigned counsel entered an Appearance on Dr. Howard's behalf on August 4, 2006;
5. All counsel have agreed to the rescheduling of Dr. Howard's deposition to September 8, 2006 to allow his counsel to prepare to represent him; and
6. No party will be prejudiced by the allowance of this motion.

WHEREFORE, the defendant, John B. Howard, M.D. respectfully requests that this Honorable Court grant this Assented to Motion to Extend the Date for the Deposition of Dr. Howard to the Date Certain of September 8, 2006.

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/s/Jessica D. Hedges

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/s/Edward F. Mahoney

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/s/William P. Breen, Jr.

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/s/Mark C. Gildea

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CERTIFICATE OF SERVICE

I, Edward F. Mahoney, counsel for defendant, John B. Howard, MD hereby certify that on the 7<sup>th</sup> day of August, 2006, I served the forgoing by mailing a copy thereof, postage prepaid to:

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/s/Edward F. Mahoney

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